

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WILLIAM STEVENS,

Plaintiff,

v.

Civil Action No. 04-11938 JLT

ROBERT HOWLAND, et al.,

Defendants.

**DEFENDANTS' MOTION FOR LEAVE
TO DEPOSE INMATE PLAINTIFF**

The defendants, through counsel, hereby move for leave of this Court to take the deposition of the plaintiff, William Stevens, pursuant to Fed. R. Civ. P. 30(a)(2). Plaintiff Stevens is committed to the Massachusetts Treatment Center at Bridgewater, MA.

In support of this motion, defendants state that the deposition of the plaintiff is necessary in order for counsel to prepare a dispositive motion and/or for the trial of this matter.

WHEREFORE, the defendants request that they be granted leave to depose the inmate plaintiff, pursuant to Fed. R. Civ. P. 30(a)(2).

Dated: December 16, 2005

Respectfully submitted,

NANCY ANKERS WHITE
Special Assistant Attorney General

/s/ Richard C. McFarland

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CERTIFICATE OF SERVICE

I, Richard C. McFarland, counsel for Defendants, hereby certify that I served a copy of the Defendants' Motion for Leave to Depose Inmate Plaintiff upon *pro se* plaintiff, William Stevens, by first class mail, postage prepaid, to his address: Massachusetts Treatment Center, 30 Administration Rd., Bridgewater, MA 02324.

Dated: December 16, 2005

/s/ Richard C. McFarland
Richard C. McFarland